## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI SOUTHERN DIVISION

#### UNITED STATES OF AMERICA

V. CRIMINAL NO. 1:14-CR-82-HSO-RHW

#### KAMRAN PAHLAVAN

## **MOTION TO SEAL**

COMES Defendant Kamran Pahlavan, by and through counsel, pursuant to the Court's general supervisory powers, and files this *Motion to Seal*, and in support states to this Court the following:

- 1) That the Defendant moves this Court to allow the Defendant to file his *Motion to Recuse* under seal with the clerk of the court. The Defendant will file the *Motion to Recuse* by June 12, 2015.
- 2) That the Defendant files this *Motion to Seal* to prevent sensitive material from being viewed by the public; specifically information related the reason for this Court's recusal.
- 3) That the Defendant files this motion to allow non-parties the opportunity to intervene for the purpose of challenging this *Motion to Seal*.
- 4) That this *Motion to Seal* is a public record of what should be sealed and why.
- 5) That this *Motion to Seal* request the sealing of documents which is no more extensive than necessary to protect parties to this case.

That, based on the forgoing, the Defendant Kamran Pahlavan respectfully requests this Honorable Court grant this *Motion to Seal* and allow the Defendant to file his *Motion to Recuse* under seal with the clerk of the court.

Respectfully submitted, this the 9<sup>th</sup> day of June, 2015.

By: <u>/s/ Peter H. Barrett</u> PETER H. BARRETT (MSB #2069) WILLIAM C. BARRETT (MSB #103326)

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# **CERTIFICATE OF SERVICE**

I, Peter H. Barrett, do hereby certify that I have this date electronically filed the foregoing *Motion to Seal* with the Clerk of the Court using the Electronic Case Filing (ECF) system, which sent notification of such filing to all counsel of record.

THIS, the 9<sup>th</sup> day of June, 2015.

/s/ Peter H. Barrett PETER H. BARRETT